

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Office of the Director
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July 21, 2017

Mr. John Prince, Acting Director
Emergency and Remedial Response Division
USEPA-Region 2
290 Broadway
New York, NY 10007-1866

Re: Wolff-Alport Chemical Company Site, Site No. 241180
Letter of Concurrence on Proposed Plan

Dear Mr. Prince:

The New York State of Environmental Conservation (DEC) and the New York State Department of Health (DOH) have reviewed the Proposed Plan (dated July 2017) for the referenced site. We understand the proposed remedy addresses both on-site and off-site radiological contaminated soils and contaminated sewer removal and cleaning. The remedy includes:

- The use of site specific cleanup criteria of 4.0 pCi/g for Th-232 and 1.0 pCi/g for Ra-226. The United States Environmental Protection Agency (EPA) will also apply the principles of "As Low As Reasonably Achievable" (ALARA) during the remedial activities. This enables EPA to take additional measures during the remedial activities that go beyond simply remediating to the specific cleanup criteria.
- Permanent relocation of all tenants and demolition of all on-site the buildings.
- Excavation and off-site disposal of all soil exceeding the site specific criteria, including highly contaminated soils that extend down to approximately 28 feet below ground surface and soil beneath the roadway and sidewalks along Irving Avenue and Moffat Street.
- Excavation (and replacement) with off-site disposal of a sewer line along Irving Avenue to approximately 50 beyond the intersection of Cooper Avenue. Bedding material will be sampled and excavated if it exceeds the above the cleanup criteria.



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- The sewer line down to Wyckoff Avenue and Halsey Street (approximately 2, 150 feet) will be cleaned using high-pressure water nozzles to flush out dirt, sediment and sludge from the sewer line.
- Confirmatory sampling will be conducted to ensure that the cleanup criteria are met prior to the restoration of the site.
- Site restoration including backfilling and reconstruction of impacted roadways and sidewalks.
- Since EPA will be applying both the site-specific cleanup criteria and ALARA principles this alternative will leave no contaminants on the Site above unrestrictive use levels, therefore five years reviews will not be necessary.

Based on the information provided by EPA, DEC and DOH concur with the proposed remedy finding it to be protective of public health and the environment. If you have any questions please contact the DEC project manager for this site, Mr. John Abunaw at (518) 402-8776.

Sincerely,



Robert W. Schick, P. E.
Director
Division of Environmental Remediation

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